



## NARRATIVE TELEVISION NETWORK

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August 12, 1997

William F. Caton  
Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Room 222  
Washington, D.C. 20554

Re: Reply Comments to Notice of Inquiry  
CS Docket No. 97-141

Dear Mr. Caton:

I am enclosing one (1) original and 11 copies of the Reply Comments of the Narrative Television Network, as well as a copy on diskette.

We would appreciate your filing the original, returning one copy to us with the "filed" stamp affixed, in the return envelope enclosed, and distributing the remaining appropriate copies within the Commission.

Thank you for your consideration of our comments.

Respectfully,

Jim Stovall  
President

Enclosures

No. of Copies rec'd  
List ABOVE

0410

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

RECEIVED  
FEDERAL COMMUNICATIONS COMMISSION  
JAN 15 1997

In the Matter of	)	
	)	
Annual Assessment of the Status of	)	CS Docket No. 97-141
Competition in the Markets for the	)	
Delivery of Video Programming	)	

To the Commission:

**REPLY COMMENTS OF  
NARRATIVE TELEVISION NETWORK  
REGARDING COST OF VIDEO DESCRIPTION**

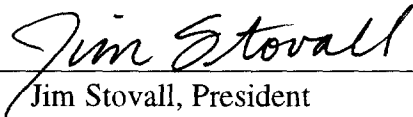
The Narrative Television Network (NTN) has ten years of experience in providing accessibility for blind and visually impaired people. NTN has more experience in a greater variety of formats distributed to a wider audience than anyone in the industry. A brief fact sheet outlining the scope and nature of our work has been enclosed.

The cost of video description, or narration, has been grossly overstated by a number of sources. Since 1988, NTN, as a for-profit commercial network, has produced more accessible programming for the visually impaired population than anyone in the field. NTN can provide the highest quality narrative programming for \$1,000 to \$1,200 per program hour. This variance is due to the video format used, the quantity of work to be completed, and the type and nature of the programming to be made accessible. As an organization owned and operated by blind and visually impaired people, we have long recognized that the practical and commercial viability of narrated programming lies in

providing video description at a cost and turnaround time comparable to captioning. We have met these goals, and continue to produce the highest quality proven production work, under these cost and time constraints. The figures stated above, \$1,000 to \$1,200 per program hour, are not a theory. NTN has consistently met these cost goals and has created a profitable, commercial tax-paying entity in doing so. Every indication is that the expansion of digital technology will bring these costs down further, and shorten the turnaround time required.

Respectfully Submitted,

NARRATIVE TELEVISION NETWORK

By:   
Jim Stovall, President  
Narrative Television Network  
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Date: August 12, 1997



# **NTN** **NARRATIVE TELEVISION NETWORK**

**COMPANION RECORDING, INC.**

5840 South Memorial Drive, Suite 312  
Tulsa, Oklahoma 74145-9082  
918 627-1000 • FX 918 627-4101

**NTN** makes television, home videos and movies accessible for our nation's 13 million blind and visually-impaired people and their families.

**NTN** unobtrusively adds the voice of a narrator to the existing programming sound track, without interfering with any of the original audio or video.

**NTN** launched in 1988, and has grown to include over 1,000 broadcast and cable affiliates, reaching 25 million homes in North America.

**NTN** has received an **EMMY** Award, a **MEDIA ACCESS** Award from the television and movie industry, an **INTERNATIONAL FILM AND VIDEO** Award, and a **GOLDEN GEORGI**, which is the top script-writing honor from The Writers Foundation of America.

**NTN** was designed to open the world of television to 13 million blind and visually-impaired Americans and their families. However, 60% of NTN's audience is made up of fully-sighted people who simply enjoy the programming.

**NTN** programming consists of a talk/interview show, followed by a narrated movie. Guests who have appeared on NTN include Katharine Hepburn, Jack Lemmon, Helen Hayes, Eddie Albert and Douglas Fairbanks, Jr., among many other of Hollywood's biggest stars.

**NTN** is available throughout the United States on Nostalgia Television and throughout Canada on the Family Channel. NTN is also carried on many independent broadcast and cable affiliates, as well as in Mexico, the Caribbean, Venezuela and New Zealand.

**NTN** is available throughout North America via its unscrambled satellite signal on Hughes G-1, Transponder 22, in addition to its broadcast and cable affiliates.

**NTN** programming is available seven days a week, and provides over 20 hours of accessible programming each week.

**NTN** has enjoyed positive publicity, including features on **CNN**, **Good Morning America**, and in **TV Guide**.

**NTN** programming has attracted significant advertisers, including **K-Mart**, **Sears** and **AT&T**, among many others.

**NTN** requires no special equipment and is a part of regular broadcast programming or basic cable in most parts of North America.

**NTN** also makes live theatre and other special events accessible, via a wireless receiver, for the blind and visually-impaired community, such as the Tony Award-winning Broadway show, "**The Will Rogers Follies**."

**NTN** offers a free Program Guide to anyone who writes requesting one from the Network.